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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

**DAEBO INTERNATIONAL SHIPPING
CO., LTD.,**

Debtor in a Foreign Proceeding

Chapter 15

Case No. 15-10616 MEW

**AMERICAN MARINE SERVICES, INC.'S
SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO *EX PARTE* APPLICATION
FOR PROVISIONAL RELIEF PENDING RECOGNITION OF A FOREIGN MAIN
PROCEEDING AND CROSS-MOTION TO DISMISS PURSUANT TO FRCP 12(b)(3)**

NOW INTO COURT, through undersigned counsel, comes American Marine Services, Inc. ("AMS") and hereby refines its earlier filed Opposition to the *Ex Parte* Application for Provisional Relief Pending Recognition of a Foreign Main Proceeding, Record Doc. No. 15. At the close of AMS's original Opposition, having discussed the matter with Louisiana counsel for SPV 1, LLC, but not yet having seen a copy of the latter's Limited Objection to Request for Provisional Relief filed as Record Doc. No. 18, AMS adopted by reference "all other non-venue related arguments raised herein by the other parties objecting to the instant Application." See Record Doc. No. 15, at p. 4. However, having reviewed the Limited Objection to Request for Provisional Relief filed by SPV 1, LLC, Jaldhi Overseas PTE. Ltd. and Richardson Stevedoring & Logistics Services, Inc., AMS is inclined to back away from that statement. In addition to

AMS's primary venue argument, AMS adopts the other Rule B Claimants' arguments except those contending that the subject vessel does not belong to Daebo and that Daebo is a nominally named defendant over whom the United States District Court for the Eastern District of Louisiana does not have *quasi in rem* jurisdiction because Daebo does not have property in that District.

Dated: March 19, 2015

Respectfully submitted,

FRILLOT, LLC



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AFFIRMATION OF SERVICE

I hereby certify that on March 19, 2015, a copy of the foregoing SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO EX PARTE APPLICATION FOR PROVISIONAL RELIEF PENDING RECOGNITION OF A FOREIGN MAIN PROCEEDING AND CROSS-MOTION TO DISMISS PURSUANT TO FRCP 12(b)(3) was filed electronically and served by e-mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by e-mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

